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Before the
Federal Communications Commission
Washington, D.C. 20554

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In the Matter of

Amendment of Section 73.202(b), Table of Allotments,)	MM Docket No. 97-	RECEIVED
FM Broadcast Stations, (Kosciusko and Madison, Mississippi))	RM	SEP 2 9 1997
To: Chief, Allocations Branch			FEDERAL COMMUNICATIONS COMMISSION OFFICE OF THE SECRETARY

PETITION FOR RULE MAKING

Boswell Broadcasting, Inc., ("Petitioner"), licensee of Station WBKJ-FM, Kosciusko, Mississippi, pursuant to Section 1.420(I) of the Commission's Rules, hereby seeks the reallotment of Channel 286C1 from Kosciusko, Mississippi, to Madison, Mississippi, and the modification of Station WBKJ's license accordingly. In support, the following is shown:

- 1. Section 1.420(I) of the Commission's Rules permits the modification of a station's license to specify a new community of license. *Amendment of Commission's Rules Regarding Modification of FM and TV Authorizations to Specify a New Community of License*, 4 FCC Rcd 4870 (1989), *recon. granted in part*, 5 FCC Rcd 7094 (1990) ("Change of Community"). Under these procedures, the Commission compares the existing arrangement of allotments with the proposed arrangement using its FM priorities. See *Revision of FM Assignment Priorities and Procedures*, 90 FCC 2d 88 (1982).
- 2. Kosciusko, Mississippi, has a population of 7,415 persons according to the 1990 Census and is the community of license of Stations WKOZ-AM and WJTA (FM) in addition to Station WBKJ. Madison, Mississippi, is a swiftly growing community which has no other station. Attached is some information from the City of Madison Chamber of Commerce which

No. of Copies rec'd Oby List ABODE HMB

shows that the population of Madison has exploded over the past decade and that it is expected to reach 15,000 in the next decade. Madison is described as the state's "fastest growing and most affluent city." Also attached is a copy of the 1990 U.S. Census which shows a population of 7,471 in 1990. Madison is located approximately 5 miles north of Jackson and has its own city government (Mayor and Aldermen), its own Police Department (with 29 policemen and 11 detectives), its own Fire Department (with two fire stations and 9 full time employees), its own school system (with two high schools, two elementary schools and two middle schools), its own Water Department, and 356 businesses. Also enclosed are two brochures showing the unique character of Madison including its own historic events and cultural activities. Under the Commission's allotment priorities, Madison would receive its first local aural transmission service (priority 3), and, therefore, is favored over the retention of two local transmission services at Kosciusko (priority 4) which will continue to be served locally by AM station WKOZ and noncommercial educational station WJTA(FM). Significantly, petitioner does not propose to relocate its transmitter site. Consequently, the reallotment will **not** result in any gain or loss areas, and the station will continue to provide Kosciusko with city grade 70 dBu coverage.

3. Madison is located within the Jackson Urbanized Area. Under certain circumstances, when the community to which the channel reallotment is sought is within an urbanized area, the petitioner must show that the community is independent from the larger city and that a rural community is not losing service to a well-served suburban community which is undistinguishable from the larger city. See, *e.g.*, *Faye and Richard Tuck*, 3 FCC Rcd 5374 (1988). Madison, on the basis of the information provided above, would meet this test as an independent community with needs separate and apart from those of Jackson. However, when , as here, the petitioner is

not proposing to move its transmitter site, no such showing need be made. This is because WBKJ is not "moving into" the Jackson Urbanized Area, it is already there. See, e.g., Georgetown and Garden City, South Carolina, DA 97-1887, released September 5, 1997, Boulder and Lafayette, Colorado, 11 FCC Rcd 3632 (1996); and East Los Angeles, et al., California, 10 FCC Rcd 2864 (1995). In fact, petitioner could not move its transmitter site even it desired to do so (see attached engineering analysis).

- 4. Attached hereto is an Allocation Study which demonstrates that WBKJ can be reallotted to Madison in full compliance with the Commission's technical rules. Exhibit 1 shows compliance with the Commission's spacing requirements. Exhibit 2 is a computer-assembled map which shows that a Class C1 station operating on Channel 286 will place the required city grade contour over Madison. Finally, Exhibit 3 is a tabulation of the distance to contours again demonstrating compliance with the Commission rules.
- 5. Accordingly, it is respectfully requested that a Notice of Proposed Rulemaking be issued proposing that the FM Table of Allotments, Section 73.202(b) of the Commission's Rules, be amended with respect to the communities listed below to read as follows:

<u>City</u>	<u>Char</u>	<u>inel No</u> .
	Present	Proposed
Kosciusko, Mississippi	286C1	
Madison, Mississippi		286C 1

When this channel is reassigned to Madison providing Madison with its first FM service and its first local aural transmission facility, Petitioner will immediately file an application (FCC Form 301) seeking to modify its license accordingly.

WHEREFORE, the premises considered, it is respectfully requested that Channel 286C1

be reallotted from Kosciusko, MS to Madison, MS in order to provide Madison with its first local service and that the license of Station WBKJ-FM be modified accordingly.

Respectfully submitted,

BOSWELL BROADCASTING, INC.

<u>By: /s William D. Sil∀a</u> William D. Silva

Law Offices of William D. Silva 5335 Wisconsin Avenue, N.W.

Suite 400

Washington, D.C. 20015-2003

September 29, 1997

Madison Mississippi

HOMETOWN, MISSISSIPPI THE CITY OF MADISON

Located just 10 miles north of Mississippi's capital city is the thriving community of Madison. Characterized by a warn, "hometown" atmosphere that belies its status as Mississippi's fastest growing city, Madison offers the rewards of both metropolitan and small town life. Blending the urban influences of Jackson with a close-knit sense of community, Madison combines a convenient retreat from crowds and congestion with close proximity to metropolitan amenities.

Boasting the state's highest per capita income and a 233% population increase over the past decade, Madison is Mississippi's fastest growing and most affluent city. This growth potential, combined with a high standard of living, has attracted hundreds of families to Madison. The number of people who choose to call Madison home has exploded over the past decade, with the population growing from 2,241 in 1980 to 7,471 in 1990 and expected to reach 15,000 in the next decade.

P. O. Box 544 Madison, MS. 39130-0544

adison

MADISON HOMETOWN MISSISSIPPI



Compliments of the City of Madison Chamber of Commerce P. O. Box 544 Madison, MS. 39130

MADISON, MISSISSIPPI

Education

Public Schools

Grades K-5

Madison Avenue Elementary

1199 Madison Avenue

Madison, MS. 39110

601-856-2951

Madison Station Elementary School

2109 Main Street

Madison, MS. 39110

601-856-6246

Grades 6-8

Rosa Scott Middle School

200 Crawford Street

Madison, MS. 39110

601-856-6159

Grades 9-12

Madison Central High School

Highland Colony Parkway

Madison, MS. 39110

601-856-7121

For more information about the public school system, call Madison County Schools at 355-7412.

Private Schools

St. Andrews Episcopal School 370 Old Agency Road Ridgeland, MS. 39157 601-853-6000 Grades 5-12 Madison- Ridgeland Academy 7601 Old Canton Road Madison, MS. 39110 601-856-4455

Grades K-12

A city of antiques and artisans, Madison showcases the talents of area craftsmen and preserves a strong sense of southern tradition. Once known as the "Strawberry Capital of the World," Madison is now regarded as the antiquing capital of central Mississippi. Shopping is the city's premier attraction, featuring rare crystal, furniture, and heirloom treasures to delight antique buffs, and one-of-a-kind gifts fashioned by local craftsmen.

For additional information about Madison, please contact the City of Madison Chamber of Commerce at 601-856-7060.

COMMUNITY SERVICES

City Government

Animal Control	856-6111
Building Permits	856-8958
City Hall	856-7116
Parks & Recreation	853-9109
Planning & Zoning	856-8958
Public Works	856-8958
Recycling	856-8958

Utilities

Entergy	969-2500
Ms. Valley Gas Co.	961-6900
Bell South	557-6500
Water	856-7116

County Government

352-9154
948-3897
352-2049
859-3316
352-8429
856-1796
856-4472
352-2049

Doing Business in

MADISON, MISSISSIPPI

Madison County

Mississippi Department of Economic and Community Development in cooperation with the Mississippi Resource Center

LOCATION

Distance to selected metropolitan areas:	
Area	Distance
Atlanta, Georgia	. 407 miles
Chicago, Illinois	. 731 miles
Dallas, Texas	. 401 miles
Memphis, Tennessee	. 200 miles
New Orleans, Louisiana	. 199 miles
Nearest city with a population of 20,000 or modistance from Madison:	ore and
Jackson	5 miles
Source: Official Mississippi Highway Map; unpublished data col MDECD; U.S. Bureau of the Census, Census of Populat	llected by ion, 1990.

POPULATION

Popula	ation:	1980	1990
	lison	2,241	7,471
Mad	lison County	41,613	53,794
1995 e 2000 p	estimate, Madison Cour projection, Madison Co	nty	66,282 71,282
Age br	eakdown of county	population:	
0 to	17		30%
18 to	o 44		45%
45 to	o 59		12%
60 a	nd over		13%
Media	n age of county populat	ion	29.6 years
Source:		Census of Population,	

UTILITIES AND SERVICES

Electricity	distributor(s):
Entergy	

W	at	er	co'	wo	σn	•

Utility name	City of Madison
Source	· · · · · · · Wells
System capacity	2,160,000 gallons per day
Average consumption	730,000 gallons per day
Peak consumption	840,000 gallons per day
Storage capacity	800,000 gallons
Sanitary sewer capacity	** gallons
Sewer treatment type	Regional sewer system
Percent of community served	
Present load	
itural gas distributor(s).	•

Natural gas distributor(s):

Entex, Mississippi Valley Gas

Telephone service provider:

BellSouth

Source: Data obtained from municipalities.

**Information not provided.

LABOR FORCE

Civilian labor force, 1995 ave	erage:
Madison	
Madison County	
Gender breakdown	Male 51%, Female 49%
Commuting area*	
Mississippi	
Civilian labor force, 12 mont	h moving average (10/96):
Madison County	31,950
Source: Mississippi Employment Security information from neighboring sta	ates, 1996.
*Commuting area includes Madison Count	ty and all contiguous counties.

EMPLOYMENT

Persons employed in Madison County, 1995 aver	age:
Manufacturing	2,440
Services	4,050
Unemployment rate, 1995 average:	
Madison	NA
Madison County	3.7%
Commuting area*	
Mississippi	6.1%
United States	5.6%
Unemployment rate, 12 month moving average (1	0/96):
Madison County	3.2%
Control Participal Participal Control 1000 H.C. Don	

Source: Mississippi Employment Security Commission, 1996; U.S. Department of Labor, Bureau of Labor Statistics, 1996; Employment information from neighboring states, 1996.

WAGE RATES

Average wage rates, 1995:

Manufacturing	
Mississippi	\$9.74/hour
United States	
Services	
Mississippi	\$9.83/hour
United States	\$11.39/hour
Courses Mississing Franciscours Courses Courses	1006 U.C.D

Source: Mississippi Employment Security Commission, 1996; U.S. Department of Labor, Bureau of Labor Statistics, 1996; Center for Policy Research and Planning, 1996.

EDUCATIONAL ATTAINMENT

Percentage of Madison population (25 years +) w	vith:
High school education or more	92.7%
Bachelor's degree or more	53.3%

Source: U.S. Bureau of the Census, Census of Population, 1990.

^{*}Commuting area includes Madison County and all contiguous counties.

FINANCIAL INSTITUTIONS

Banks	Local	Branch
Number of establishments**	0	3
Total assets	\$0	\$9,966,153,000
Savings and Loans	Local	Branch
Savings and Loans Number of establishments**	Local 0	Branch

Source: Mississippi Department of Banking and Consumer Finance, Annual Report. 1996.

** Numbers shown represent the number of institutions as opposed to locations.

TRANSPORTATION

Highways:

MS 463 US 51 I-55, I-220

Railroads:

Illinois Central

innois Centar
Air:
Nearest commercial airport:
Jackson International, Jackson
Distance (miles)
Length of runway 8,500 ft.
Major airlines serving the airport:
Delta, Continental Express, USAir Express,
Northwest Airlink, American Eagle, TWA
Nearest general aviation airport:
Bruce Campbell Field, Madison
Distance (miles) Local
Length of runway
Motor freight carriers operating in area:
Number of common carriers
Nearest full-service port:
Port of Vicksburg
Post Office Box 709
Vicksburg, MS 39180
601-636-1012
Distance from Madison (miles)
Name of waterway Mississippi River
Channel depth 8 ft.

Source: Mississippi Department of Transportation; Mississippi Port Authorities; Mississippi Institutions of Higher Learning, Handbook of Selected Data; unpublished data collected by MDECD.

CONTACTS

Mississippi Department of Economic and Community Development West Central Field Office

Post Office Box 849 Jackson, Mississippi 39205 601-359-3593

Madison County Economic Development Authority

Post Office Box 201 Canton, Mississippi 39046 601-859-1990

Madison Chamber of Commerce

Post Office Box 544 Madison, Mississippi 39130 601-856-7060

Central Mississippi Planning and Development District

Post Office Box 4935 Jackson, Mississippi 39296-4935 601-981-1511

PROPERTY COSTS

Cost of housing, median value 1990:	
Madison	
United States	. \$79,098
Property tax:	
Counties and municipalities levy a property tax on rea	al and

personal tangible property. Most property is assessed at 15% of true value. Motor vehicles and utilities (excluding railroads) are assessed at 30% and owner-occupied residential properties are assessed at 10% of true value.

Average county millage 81.76

Approximate annual property tax calculation: $Tax = (V \times A \times M) / 1,000$

V=property value (\$), A=assessment percentage (%), M=millage rate

Example for a home valued at \$90,000 and millage of 94.27: $(90,000 \times 10\% \times 94.27) / 1,000 = $848 \text{ annual property tax}$

Source: Mississippi State Tax Commission, 1996; U.S. Bureau of the Census, Census of Population, 1990; Mississippi State Rating Bureau, 1996.

COST OF LIVING INDEX*

Madison County													103.86
United States													

Source: Mississippi Institutions of Higher Learning, 1993.

For information regarding this profile, or for additional copies, contact the Mississippi Department of Economic and Community Development, Existing Industry and Business Resource Bureau, at 601-359-3593 or fax to 601-359-3458.

An index of less than 100.00 indicates a cost of living lower than the national

shops filled with treasures. Tree-lined avenues dotted with historic structures, A scenic route more than 8,000 years old. The excitement of water sports, hunting, and

fishing around a 36,000 acre reservoir.

This is Madison. A thriving community located just 10 miles north of Jackson, Mississippi's capital, the City of Madison is the perfect destination for a day-long getaway or an afternoon excursion.

A city of antiques and artisans, Madison showcases the talents of area craftsmen and preserves a strong sense of southern tradition. Once known as the "Strawberry Capital of the World,"



Madison is now regarded as the antiquing capital of central Mississippi. Shopping is the city's premier attraction, featuring rare crystal, furniture, and heirloom treasures to delight antique

buffs, and one-of-a-kind gifts fashioned by local craftsmen.

For outdoor types, the 36,000-acre Ross Barnett Reservoir offers water sports, fishing, and hunting, and the scenic Natchez Trace Parkway features an abundance of picnic tables, nature trails, and marked historic sites.

Madison offers a wealth of family oriented attractions and recreational opportunities, many reflecting the area's colorful history and culture. Discover Madison...Hometown, Mississippi.

Madison Parks and Recreation

Important Dates to Remember

April-JuneBaseball/Softball Season at Liberty Park ..Summer Day Camp (Every Wednesday in July) at Liberty Park (call 853-9109 for more information) Age: 1st through 6th Grade (must be 6 by September 1st) .Celebration (call 853-9109 for more information) ..Fall soccer registration ...Fall baseball registration ...Liberty Fest at Liberty Park DecemberSee Inside



For additional information on Madison attractions and events, contact:

The City of Madison Chamber of Commerce 710 Magnolia Street P.O. Box 544 Madison, Mississippi 39130 (601) 856-7060 or Madison Parks and Recreation (601) 853-9109











ANNUAL EVENTS





April
Easter Egg Hum
Strawberry Patch Park
(601) 853-9109
Fun for all the children

Madison Civic Ballet Performance (601) 853-0291

May

Mississippi Wing of the Confederate Air Force Annual Open House CAF Hangar behind Old Carlon Ruad fire station (6d1) 981-6040 Food outertainment and vintage aircraft

June

Heatwave Classic Triathlon Old Trace Park, Rice Road (601) 856-7060

Selected by <u>Triathlon Today</u> as one of the top 12 small races in North America, the Heatware Classic attracts more than 400 athletes who compete in a half-mile strim, 24.5 mile bike ride, and a five mile run. Sponsored by the Madison Ridgeland Junior Auxiliary.

July

Deposit Guaranty Golf Classic (601) 856-9290 PGA event at Annandale Golf and Country Chib

September

Cajum Fest St. Francis of Assisi Catholic Church (601) 856-5556 Cajun food served in a festive atmosphere unit live music and children's games.

enmanfort

Saint Joseph's Catholic Church, Gluckstadt

(601) 856-2054

German food, music, and fun offered by the descendants of German farmers in a festive celebration of the area's German beritage.

October

Day in the Country Chapel of the Cross (601) 856-2593

Annual day of foud, crafts, and games held at the historic Chapel of the Cross.

Pioneer and Ludian Heritage Festival
Mississippi Crafts Center
Natchez Trace Parkway, Ridgeland
(601) 856-7546
A celebration of Mississippi's pioneer and Native American beritage.

December

Madison Christmas Parade/Community Tree Lighting Ceremony (601) 855-9109

A community celebration of the season beginning with a parade and ending at dusk with entertainment and the lighting of the city Oristmas tree.

"The Nuteracker" Madison Gwic Hallet Madison County Cultural Center (601) 853-0291

All events, times, dates and places are subject to change. Please call to confirm event information.

Chapel of the Cross-- Highway 463 at Mannsdale Road, (601) 856-2593. Built in 1850, the Gothic-styled Chapel of the Cross was commissioned by Mrs. Margaret Johnston as a memorial to her late husband. Bricks for the building were fashioned by slave labor on Mrs. Johnston's plantation, Annandale, on her daughter's nearby plantation, Ingleside. The chapel's rafters were carved from giant trees which grew on the two properties.

In 1985 the Church became a full time parish with a resident rector and regular Sunday services. The Chapel of the Cross is listed on the National Register of Historic Places, and the nearby subdivisions of Annandale and Ingleside are named for the two family plantations.

Ross Barnett Reservoir— East of Madison, (601) 354 3448. The 36,000 acre Reservoir supports a wealth of water-related recreational activities. Swimming, sailing, and water skiing are popular sports, and miles of wooded coastlines and hundreds of hidden inlets beckon to explorers.

The Reservoir is the state's prime bass fishing ground, and is also populated by carlish, bream, and white perch. When temperatures dip in the fall, the focus shifts to the wooded areas surrounding the Reservoir, where hunters pursue a variety of game and migrating waterfowl.

The Reservoir features full-service marinas, campgrounds, picnic areas, and boat launch ramps. A number of waterfront restaurants and exciting nightspots offer fine dining and live entertainment combined with excellent water views.

Natchez Trace
Parkway-- In Madison
contact Daniel Brown, (601) 8421572, or Mary Hawkins of the
Natchez Trace Parkway Association,
(601) 856-7116. The Natchez Trace
Parkway Headquarters is located in

Rupelo, Mississippi and may be reached at (601) 842-1572. Madison is bordered on the cast by the historic Natchez Trace Parkway, a scenic highway that stretches diagonally across the state winding from Natchez, Mississippi to Nashville, Teanessee. Over 400 miles long and 8,000 years old, the Natchez Trace was originally traced out by buffalo, then trekked by Indians, and finally trampled into a rough road by traders, trappers, and missionaries.

Today the Trace is a national highway maintained by the National Park Service under the Department of the Interior. The parkway is generously sprinkled with picnic sites, historic markers, and nature trails. Quick trips along individual sections of the Trace make ideal afternoon excursions.

Simmons Arboretum— A 10-acre arboretum that showcases Mississippi's diversity of plant life. The Simmons Arboretum is located on 10 acres of donated land between the Natchez Trace Parkway and St. Augustine Road, and features Mississippi plants, trees, and shrubs as well as a deck overlooking adjoining wetlands.



Historic Buildings—Contact the City of Madison Chamber of Commerce, (601) 856-7060. Four of Madison's historic structures are listed on the National Register of Historic Places. These lovely old building include the Strawberry Patch House (Old Canton Road), which once served as the centerpiece of a 100-acre strawberry farm; the Hoy House, which is located on Main Street and is the oldest building in

Madison, pre-dating the founding of Madison by several years; the Montgomery House, also on Main Street and a fine example of A.J. Downing's interpretation of Gothic Revival architecture; and the old Madison-Ridgeland High School and Gymnasium (Montgomery Street), originally constructed in 1910 and the earliest known example of Jacobethian architecture found in Mississippi.

Old Madison Station District—— Contact the City of Madison Chamber of Commerce, (601) 856-7060. Permanently preserved as Madison's historic and cultural focal point, this former center of railroad activity is now a quaint restored area of shops ideal for browsing.

Antiquing is a favorite pastime, with a number of shops located in the historic district surrounding the depot.

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DIVERSE CULTURAL EVENTS AND FIVE ARTS Madison Square Center for the Arts:

Located on Main Street, this historic building is home to the Madison County Civic Ballet, Madison County Youth Theater, Canton Community Players, and Madison County Music Conservatory. Performances throughout the year include The Nutcracker and The Requiem. Residents of Madison can take classes at the center in dance, theater, art, and music.

Diker Events and Activities: Pioneer and Indian Heritage Festival, Deposit Guaranty Golf Classic, City of Madison Annual Christmas Parade, Germanfest, Cajun Fest, Day in the Country at Historical Chapel of the Cross, Canton Flea Market, and the Hot Air Balloon Festival.

EIHICATIONAL OPPORTENTIES in Madison, you can find programs and courses for almost any interest and subject. • 5 four-year institutions and 2 two-year community colleges are located in the metro area. • Adult and community enrichment programs are offered locally.





This project is partially junded through a grant by the Mississippi Department of Economic and Community Development



MADISON

"to minutes away, and a world apart"

W#5120H - W ORIGINS HAMSTOWN COMMUNICAL

Welcome to Madison! A "hometown" community full of warm, friendly faces. Once a thriving farming community, Madison has succeeded in preserving its small-town flavor.

Today neighbors still share recipes and talk about the weather. And, with Jackson, the state's capital just minutes away, you have the best of both worlds.

A small-town life combined with all that a metropolitan



area has to offer. Everything you

need is nearby: shopping, hospi-

tals, golf courses, parks, churches,

and colleges. And the weather is perfect for enjoying your favorite activities. In Madison, you can expect short, mild winters and long, lazy, warm summers. All this makes Madison the perfect place for new beginnings... for the retirement you've always wanted. We invite you to make Madison your hometown community.

THE IDEAL LOCATION • Situated amidst the rolling hills of central Mississippi, Madison is just to minutes away from Jackson, the state's largest city. You can find the state's best entertainment, shopping, medical services, educational, and cultural offerings. • In less than three hours, you can dine in New Orleans, shop in Mobile or Memphis or fish on the Gulf Coast. • With Jackson International Airport only 20 minutes away, you have easy access to destinations throughout the world on several major air carriers. • Our city of 10,000 not only has a very low crime rate as compared to other cities in the Southeastern U.S., but in the nation. • If you are retired, income from public and private qualified pension plans is exempt from state income taxes.

QUALITY HEALTHCARE FACILITIES Madison is convenient to the state's best medical facilities and services. • Six major hospitals are located in the metro area. • St. Dominic-Jackson Memorial Hospital, known for its technically advanced Mississippi Heart Institute and state-of-the-art critical care areas, is located within 15 minutes.





RECREATIONAL ACTIVITIES

Country Clubs: The clubs in the Madison area offer golf, tennis, and fine dining. The Annandale Country Club has a golf course designed

by Jack Nicklaus that will test the skill of the most avid golfer. Other clubs include Whisper Lake Country Club and the Northbay Country Club. **Shopping:** The Old Madison Station District was once the center of railroad activity for Madison. Today it's the home to a number

of unique shops.

And, If you like
antiquing you'll find
the area surrounding
the depot perfect
for browsing.

Reservoir and Parks: The 33,000



acre Ross Barnett Reservoir just east of Madison is ideal for fishing, boating, water skiing, picnicking and camping. Strawberry Patch Park is a seven-acre neighborhood park with walking trails and playground equipment. Simmons Arboretum features Mississippi's plants, trees, and shrubs. The historic Natchez Trace Parkway is a scenic highway with picnic sites, historic markers, and nature trails.

Mathson is nationally rated as one of America's best places to retire according to Retirement Places Rated by David Savageau

Allocation Study for WBKJ Kosciusko, Mississippi

This allocation study has been completed for Boswell Broadcasting Company, licensee of WBKJ in Kosciusko, Mississippi. This study was executed to establish if WBKJ could be reassigned to Madison, Mississippi. This petition is being filed pursuant to Section 1.420(i) of the Commission's Rules. Section 1.420(i) permits the modification of a station authorization to specify a new community of license without affording other interested parties an opportunity to file a competing expression of interest. WBKJ can be reassigned to Madison without any other changes being made in the table of assignments (73.202). No substitute in transmitter site is being planned, just a change in assigned communities. A number of exhibits have been composed that describe to the Commission that this proposal meets all the requirements of the Rules. If WBKJ is allowed to make this modification, Kosciusko will still be left with one full time service, WKOZ, which operates at 1340 on the dial. This will allow Madison to have its first service of any kind. Madison is a swiftly-growing city, located in one of the fastestgrowing counties in the state of Mississippi.

Exhibit 1 is an allocation study conducted from the present site of WBKJ. From

1



this allocation study, it can be established that no site is attainable for WBKJ based upon 73.207. The applications filed for Prentiss, Mississippi, show that they are short-spaced to WBKJ, but this is not the case. They were filed under 73.215, which denotes their interfering contour cannot intersect WBKJ's 60 dbu contour. This is also the case with the applications for Oxford, Mississippi, so the site now does meet the specifications set forth by 73.207.

Exhibit 2 is a computer-assembled map which shows that a Class C-1 station operating on Channel 286 assigned to Madison can place the required city contour over the city of Madison. In order to determine the distance to the city grade contour in the direction of Madison, we conducted a terrain study using the authorized site and antenna height of WBKJ. The procedures the commission set forth in its Rules to determine distance to contours were implemented in making these calculations.

Exhibit 3 is a tabulation of the distance to contours. These contours show only the approximate extent of coverage over average terrain without any interference. In order to calculate the distance of these contours, we followed the procedure the commission outlined in 73.312. The eight radials were plotted from the NGDC 30 second database starting with true north and then preceding clockwise at 45 degree intervals until 360 degrees were completed. The ninth radial that passes through Madison was not included when the average of all the other radials was employed to determine the average terrain. From the data we utilized above, we extracted elevation points in the 3-

16 kilometers section only. No roughness factor was included in making these determinations.

Based upon our interpretation of the Commission's Rules, Channel 286-C1 can be assigned from Kosciusko, Mississippi, to Madison, Mississippi, giving Madison its first FM service. Therefore, the petitioner requests that the FM Table of Assignments be amended to specify that 286-C1 is assigned to Madison, Mississippi. When this channel is assigned to Madison, Boswell Broadcasting Company will immediately file a 301 to transfer WBKJ from Kosciusko to Madison.

Sisk Engineering and Olvie E. Sisk assume no liability for any errors or omissions in the information hereby provided, and shall not be liable for any injuries or damages (including consequential) which might result from use of this engineering report. Sisk Engineering, Inc. and Olive E. Sisk assume no liability for this report if it is accepted or rejected by the Federal Communications Commission. The Applicant agrees with these stated terms and conditions or this report is considered null and void and is not to be utilized in any way or filed with the Federal Communications Commission.

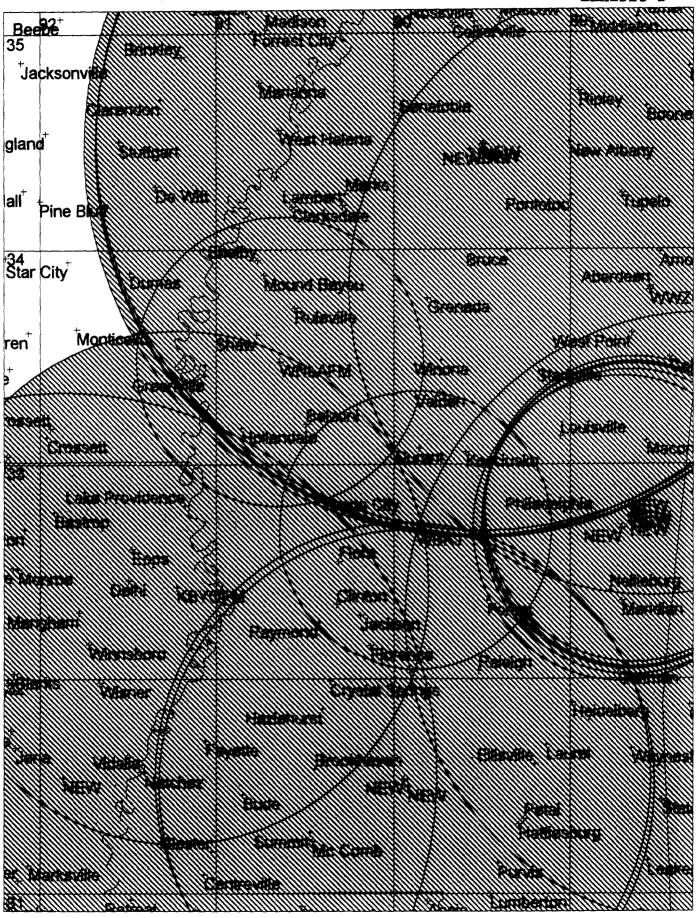
Olvie E. Sisk

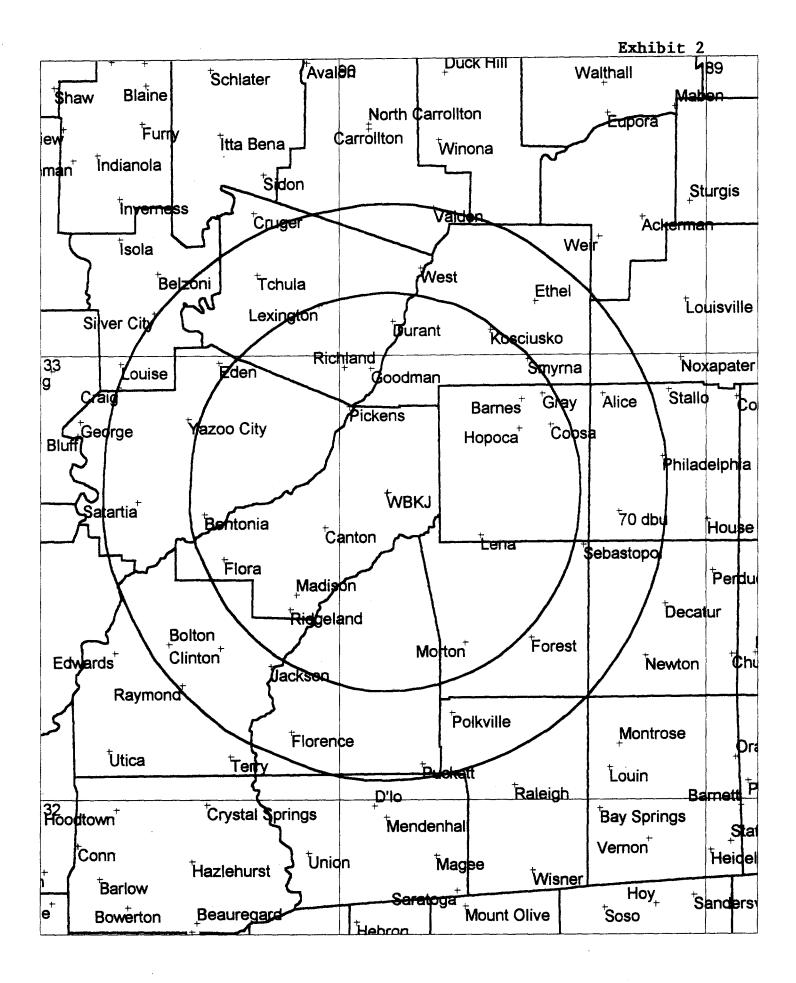
Sisk Engineering, Inc.

Olive E. Sish

P.O. Box 2116

Tupelo, MS 38803





TERRAIN AND CONTOUR DATA

ERP = 100 kWFM - 2-6 Tables

Azimuth Deg T.	Ave. Elev. 3 to 16 km Meters AMSL	Effective Antenna Height Meters AAT	ERP	F(50-50) Distance to 70 dBu Contour km	F(50-50) Distance to 60 dBu Contour km
0	86.2	302.8	20.000	50.3	72.6
45	93.9	295.1	20.000	49.8	72.0
90	99.4	289.6	20.000	49.4	71.6
135	91.7	297.3	20.000	49.9	72.2
180	94.4	294.6	20.000	49.7	72.0
225	92.4	296.6	20.000	49.9	72.1
270	88.9	300.1	20.000	50.1	72.4
315	76.7	312.3	20.000	50.9	73.3

Ave. = 90.5 M 298.6 M

Antenna Radiation Center AMSL = 389.0 M

Geographic Coordinates:

North latitude: 32 41 25 West longitude: 89 52 06